

# EXHIBIT B

# EXHIBIT B-1

Declaration of Justin Sivin

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001

03 MDL 1570 (GBD) (FM)  
ECF Case

This document relates to:

*Ashton et al. v. al Qaeda Islamic Army, et al.*, 02-cv-6977 (GBD)(FM)

I, JUSTIN SIVIN, hereby declare:

1. I am the stepson of Joel Miller who was killed in the September 11, 2001 Terror Attacks.

2. My first memory of Joel was when I was 13 years old and at my bar mitzvah. My parents had separated about a year and a half earlier and Joel was there with my mother as a couple. I remember this well, because the two of them lit a candle on my bar mitzvah cake together. While at that time, my biological father was also in my life (and at my bar mitzvah), he died from a heart attack a few months later. Joel was a constant presence in my life from that point on.

3. My mother and Joel got engaged when I was 13 years old and married when I was about 15 years old. I resided in the same household from that point on until his death, when I was 21 years-old.

4. Joel was present in my life from the time that he and my mother became a couple and was even at my father's funeral. He was the only father figure I had from age 13 and on.

5. Joel took me to school, attended all of my football games on Saturday when my mother was working, and went to every choir recital that I was in in high school. He helped

me pack up and brought me up to college. He treated me as if I was his son. Though he had one biological son and my mother had two, as far as Joel was concerned he had three sons.

6. Joel was very respectful of the role he played in my life. Joel was gentle, non-intrusive and respectful of my personality and quirks.

7. In every way, Joel acted like a father and that is how he treated my brother and me. When my mother and Joel were married, he insisted that their will include my brother, Joel's son (my stepbrother) and myself as equals.

8. The loss of Joel on September 11, 2001 devastated us. My mother has spent the last 18 years since 9/11 servicing the families of the victims and speaking publicly about the effects of 9/11 on families. As time has passed, my brother and I are even more aware of the void that cannot be filled since Joel's death. Our children have never met their grandfather although we keep his memory alive in the stories that we tell.

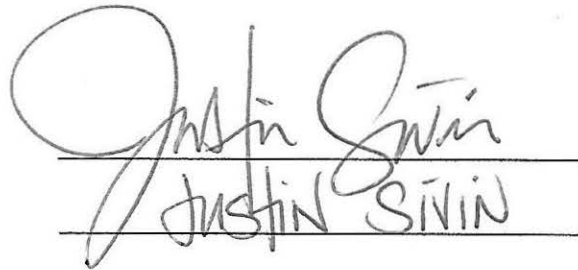
I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 12-31-2019

Place: NORTH CAROLINA

Signature:

Print:

  
JUSTIN SWIN

# EXHIBIT B-2

Declaration of Maxwell Sivin

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

|   |                                    |
|---|------------------------------------|
| In re Terrorist Attacks on September 11, 2001 | 03 MDL 1570 (GBD) (FM)<br>ECF Case |
|---|------------------------------------|

This document relates to:

*Ashton et al. v. al Qaeda Islamic Army, et al.*, 02-cv-6977 (GBD)(FM)

I, MAXWELL SIVIN, hereby declare:

1. I am the stepson of Joel Miller who was killed in the September 11, 2001 Terror Attacks.
2. I first met Joel when I was about 13 years old, after my biological parents had separated. He and my mother were a couple from that time on. They became engaged when and then married about two years later. While my biological father was in my life still, he died when I was just 15 years old. Joel was present throughout all of those years and was even at my father's funeral. He was the only father figure I had from age 15 and on.
3. After my parents married, they did not move in together immediately, but after my mother's house burnt down when I was around 17 years old we all lived together from that point until the time of Joel's death, when I was 22 years old.
4. I began living full time with Joel when I was 17, Joel and my mother married shortly after we all began living together. I resided in the same household from that point on until his death, I was 22 years-old.
5. Joel guided me through high school, college and law school and treated all three of his boys – his biological son as well as my biological brother and me – as if we were all one of his own. He made sure I had a suit that was good enough for law school interviews.

6. Joel was an incredibly intelligent man and our lives were intertwined. We lived together as a family, which included the normal family activities such as Sports, all holidays, dinners, and day-to-day activities. He was not very athletic, but loved to watch sports on TV and was present in every normal daily activity from the time he came into my life until the day he was killed.

7. He attended every one of my high school track and field events and we also vacationed every year in the Catskills. We went to games together, and he was there to bring me to my first day of law school. My son Noah's Hebrew name is named after Joel.

8. Joel's death on September 11, 2001 devastated us. My mother lost her true love and the person we had all built our lives around. My brother and I had moved on to a normal life after many losses prior to Joel and then he was taken from us as well. Our whole lives are now tied to a mass tragedy and that includes constant reminders, which we cannot escape from. My mother is now alone and my children have to grow up without any understanding of what happened. It affected life, careers, family and almost every day-to-day activity. My mother is alone, we have no father figure to look up to and my children have no grandfather.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: New York

Place: 12.19.2019

Signature:

Print:

Maxwell Sivin  
Maxwell Sivin

# EXHIBIT B-3

Declaration of Donald Scauso



**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001

03 MDL 1570 (GBD) (FM)  
ECF Case

This document relates to:

*Ashton et al. v. al Qaeda Islamic Army, et al.*, 02-cv-6977 (GBD)(FM)

I, DONALD SCAUSO, hereby declare:

1. I am the stepson of Dennis Scauso, a New York City firefighter who was killed in the September 11, 2001 Terror Attacks.

2. Dennis Scauso married my mother, Janlyn in 1993, when I was three years old. I took his last name.

3. I resided with and was raised by my father, Dennis, from the age of three until his death on September 11, 2001. My biological father has been absent from my life since I was 3 months old.

4. Dennis raised and supported all of us, my sister Darcie, and my younger sisters Gabrielle and Juliette. Dennis entering our lives was a godsend to Darcie, my mother, and I. Dennis was the only father I ever knew. He completely supported our family financially and emotionally.

5. Dennis was a real family man and a jack-of-all-trades, he could build and fix anything. He built us a treehouse from an old spiral staircase he recovered. He always helped with homework and ate dinner with us as a family every night. We took family vacations together.

6. Dad had the whole family in on his projects. Together we laid our home's 40-foot brick patio.

7. Dennis's death on September 11, 2001 left huge void in my life and heart. I was 11 years old when he was murdered. I could not cope with the loss and gave my Mom many years of heartache and struggles by acting out and rebelling, and getting into trouble.

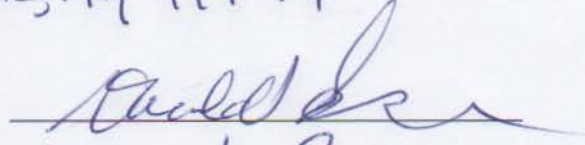
I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 12/31/19

Place: 31 Auden Avenue, Melville, NY 11747

Signature:

Print:

  
Donald Scauso